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CC 98-170

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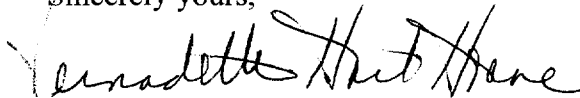
The Federal Communications Commission
Office of the Secretary
1919 M Street, NW
Room 222
Washington, DC 20554

November 9, 1998

To Whom It May Concern:

Enclosed please find an original and four copies of Irene Etzkorn's formal comments on the FCC's Common Carrier Bureau Forum addressing Truth-In-Billing, CC Docket No. 98-170
FCC # 98-232. If you need anything further or have any questions or comments please feel free to contact me at 212 707-3913.

Sincerely yours,



Vernadette Hart Horne

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In the Matter of

**FCC Truth-In-Billing Forum on Providing
Customers with Accurate and Understandable
Information in Their Telephone Bills**

CC Docket No. 98-232

COMMENTS OF

**Irene A. Etzkorn
Executive Vice President
Director, Simplified Communications Worldwide
Siegel & Gale**

Irene Etzkorn of Siegel & Gale files these comments on November 9, 1998 in the FCC's Common Carrier Bureau Forum addressing Truth-In-Billing, CC Docket No. 98-232. As the pioneers of a highly effective approach to simplification of complex billing information, we are pleased to see the FCC propose regulations for telephone bills that emphasize clarity for the consumer. However, well-intentioned disclosure often does not meet its objective of providing clear, actionable information for consumers. We believe that a specific set of bill standards which take into account the real world issues of production and postage yet addresses customers' need for clarity are an essential amendment to the proposed regulations. To share our expertise, and help the FCC refine the guidelines, Siegel & Gale have prepared the following suggestions:

I. Produce a document similar to the *Plain English Handbook* issued by the SEC in 1998.

The SEC Handbook provides plain English principles with examples and also provides a list of writing techniques to avoid. The FCC should not take a prescriptive approach, but should create writing and design guidelines, which show how clear writing and information design can transform dense, convoluted bills into readable, understandable bills for communications products and services.

II. Eliminate the tension between clarification and simplification.

There is disagreement within the industry on whether to clarify or simplify consumer bills. To some, clarification means adding greater detail while to others it means summarization. There is no correct answer to this conundrum as there is an audience for both ends of the spectrum. The solution is to allow companies to customize their bills and provide information based on customer preference, including level of detail, frequency, media (i.e., on-line bills). This will allow the individual consumer to determine the most effective communication to meet his needs.

III. Take operational feasibility into account.

This point should be considered in conjunction with point I. The FCC should not mandate mechanistic measures of clarity such as type size, the use of all uppercase type, icons, readability formulas, etc. Readability formulas, for example, do not take into account context or meaning so that sentences run backwards or forwards through a formula receive the same score. Similarly, type size legibility varies depending upon the typeface used.

IV. Incorporate a service profile as part of the customer's bill.

A service profile could alert customers to unauthorized changes to their service or carrier. However, as a separate mailing there is the strong possibility that it will be discarded by the consumer. We believe it should not be a separate mailing, but could effectively be used periodically as a part of the bill to remind the consumer of the services being provided and the carriers used.

V. Clarify service vs. usage for the consumer.

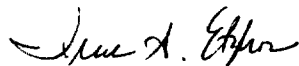
Two different time frames are addressed in every consumer's bill – the services, such as monthly access charges, which are billed before they are provided, and calls, which are billed after they are made. This combination in one bill often results in confusion. Consumers need a clear explanation of the difference in how these charges are billed, and in particular, how pro rated services are handled.

VI. Provide clearer descriptions of USOC codes for consumers.

USOC codes are the root of unclear descriptions on bills. Lack of clear language and context makes it impossible for consumers to understand USOC codes. We have helped numerous companies create bills that are clear and concise and in our work have discovered that approximately 200 codes are used in 90% of cases and others are esoteric. We understand that it is not possible to eliminate the use of the codes, but we would suggest preparing a consolidated and simplified list of the most commonly used codes.

The goal of plain English is clarity not brevity, and the challenge is to explain terms that are difficult to understand, not remove them. Simple is Smart.

Submitted by:



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